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9 *Attorney for Plaintiff*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 TERAS SMITH, an individual,

Case No.: 2:23-cv-01708

13 Plaintiff,

14 vs.

15 AEG MANAGEMENT LAS VEGAS, LLC,  
16 a foreign limited-liability company; ABM  
17 INDUSTRY GROUPS, LLC, a foreign  
18 limited-liability company; DOES 1 through  
19 10; and ROE ENTITIES 11 through 20,  
20 inclusive jointly and severally,

21 Defendants.

22 **STIPULATION AND ORDER TO**  
23 **EXTEND TIME TO FILE**  
24 **RESPONSES TO MOTIONS FOR**  
25 **SUMMARY JUDGMENT**  
26 **(FIRST REQUEST)**

27 Pursuant to Local Rule ("LR") IA 6-1, Plaintiff TERAS SMITH ("Plaintiff") and  
28 Defendants ABM INDUSTRY GROUPS, LLC ("ABM") and AEG MANAGEMENT LAS  
VEGAS, LLC ("AEG") (hereinafter may be referred to collectively as the "parties"), by and  
through their respective counsel of record, stipulate, agree, and hereby request to extend the  
deadline to file and serve points and authorities in response to the Motions for Summary Judgment  
and Joinders thereto that Defendants ABM and AEG filed on June 25, 2024. (ECF Nos. 35, 37,  
40, 41). Pursuant to LR 7-2(b), the current deadline to file responses to these motions is July 16,  
2024. For the reason set forth below, the parties request that this deadline be extended two (2) days  
to July 18, 2024. This is the first stipulation for extension of time to file motions or briefing  
responsive thereto.

The reason the parties are requesting this extension is because counsel for Plaintiff TERAS  
SMITH has a pre-planned and pre-paid family vacation that begins on July 10, 2024, and counsel  
will not be returning to the office until approximately noon on Monday July 15, 2024. Moreover,

Plaintiff's counsel's calendar on the afternoon of July 15, 2024 and July 16, 2024 will not allow him ample time to draft responses to these Motions for Summary Judgment on or before the current July 16, 2024 deadline.

The parties thus stipulate and agree that Plaintiff's deadlines to respond to the Motions for Summary Judgment and Joinders thereto shall be extended from July 16, 2024 to July 18, 2024. The parties further stipulate and agree that Defendants' deadlines to file replies in support of their Motions shall be fourteen days after the service of Plaintiff's responses. LR 7-2(b).

**IT IS SO STIPULATED.**

Dated this 9<sup>th</sup> day of July, 2024.

/s/ Sebastian Cribari  
 Jeremy R. Alberts, Esq.  
 Sebastian Cribari, Esq.  
 WEINBERG, WHEELER, HUDGINS,  
 GUNN & DIAL, LLC  
 6385 South Rainbow Blvd., Suite 400  
 Las Vegas, Nevada 89118  
 Attorneys for Defendant AEG  
 Management Las Vegas, LLC

Dated this 9<sup>th</sup> day of July, 2024.

/s/ Micah K. Mtatabikwa-Walker  
 JOSH COLE AICKLEN  
 Nevada Bar No. 007254  
 DAVID B. AVAKIAN  
 Nevada Bar No. 009502  
 MICAH K. MTATABIKWA-WALKER  
 Nevada Bar No. 13731  
 LEWIS BRISBOIS BISGAARD & SMITH, LLP  
 6385 S. Rainbow Boulevard, Suite 600  
 Las Vegas, Nevada 89118  
 Attorneys for Defendant ABM Industry Groups, LLC

Dated this 9<sup>th</sup> day of July, 2024.

/s/ Scott L. Rogers  
 SCOTT L ROGERS, ESQ.  
 Nevada Bar No. 013574  
 MITCHELL ROGERS INJURY LAW  
 2020 W. Sunset Road  
 Henderson, Nevada 89014  
 Attorneys for Plaintiff Teras Smith

**IT IS SO ORDERED.**



RICHARD F. BOULWARE, II  
 UNITED STATES DISTRICT JUDGE

DATED: July 11, 2024.

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 9<sup>th</sup> day of July, 2024, a true and correct copy of the foregoing **STIPULATION TO EXTEND TIME TO FILE RESPONSES TO MOTIONS FOR SUMMARY JUDGMENT (FIRST REQUEST)** was served upon the following by the method indicated:

Jeremy R. Alberts, Esq.  
 Sebastian Cribari, Esq.  
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 GUNN & DIAL, LLC  
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 ssouthworth@wwhgd.com  
*Attorney for Defendant AEG  
 Management Las Vegas, LLC  
 Attorneys for Defendants*

<input type="checkbox"/>	via U.S. Mail
<input type="checkbox"/>	via Hand Delivery
<input type="checkbox"/>	via Facsimile
<input type="checkbox"/>	via Overnight Delivery
<input type="checkbox"/>	via CM/ECF
<input checked="" type="checkbox"/>	via Electronic Mail

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 micah.mtatabikwa-  
 walker@lewisbrisbois.com;  
 misty.pettiford@lewisbrisbois.com  
*Attorney for Defendant ABM Industry  
 Groups, LLC*

*/s/ Winde Goldstein*  
 Employee of MITCHELL ROGERS INJURY LAW

MITCHELL ROGERS INJURY  
 LAW

**Re: Smith, Teras v. ABM Industry Groups, LLC: Request for Two-Day Extension to Respond to Motions for Summary Judgment**

Scott Rogers <scott@mriattorney.com>

Tue 7/9/2024 11:41 AM

To: Cribari, Sebastian <scribari@wwhgd.com>; Avakian, David <David.Avakian@lewisbrisbois.com>  
Cc: Mtatabikwa-Walker, Micah <Micah.Walker@lewisbrisbois.com>; Butler, Maceo <Maceo.Butler@lewisbrisbois.com>; Kurilla, Peggy <Peggy.Kurilla@lewisbrisbois.com>; Cabo, Ciarra Lei <CiarraLei.Cabo@lewisbrisbois.com>; Alberts, Jeremy R. <JAlberts@wwhgd.com>; Winde Goldstein <winde@mriattorney.com>; Bonney, Audra R. <ABonney@wwhgd.com>; Pastore, Sara B. <spastore@wwhgd.com>

📎 1 attachments (53 KB)

ORDR - Stipulation and Order to Extend MSJ Response Deadline (SEC rev).docx;

Sebastian,

I agree, and I'll replace Jeremy's signature with yours.

David/Micah,

Please advise if we can affix your e-signature to the updated SAO that is attached.

**SCOTT L. ROGERS, ESQ.**

Trial Attorney

**O:** 702.702.2622 **F:** 702.580.8860

**E:** scott@mriattorney.com

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**MITCHELL ROGERS INJURY**  
————— L A W —————

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**From:** Cribari, Sebastian <scribari@wwhgd.com>

**Sent:** Tuesday, July 9, 2024 11:23 AM

**To:** Scott Rogers <scott@mriattorney.com>; Avakian, David <David.Avakian@lewisbrisbois.com>

**Cc:** Mtatabikwa-Walker, Micah <Micah.Walker@lewisbrisbois.com>; Butler, Maceo <Maceo.Butler@lewisbrisbois.com>; Kurilla, Peggy <Peggy.Kurilla@lewisbrisbois.com>; Cabo, Ciarra Lei <CiarraLei.Cabo@lewisbrisbois.com>; Alberts, Jeremy R. <JAlberts@wwhgd.com>; Winde Goldstein <winde@mriattorney.com>; Bonney, Audra R. <ABonney@wwhgd.com>; Pastore, Sara B. <spastore@wwhgd.com>

**Subject:** RE: Smith, Teras v. ABM Industry Groups, LLC: Request for Two-Day Extension to Respond to Motions for Summary Judgment

Scott,

Minor revisions and a stipulation block added. Please let me know if you are agreeable to the changes.

Thanks.

**RE: Smith, Teras v. ABM Industry Groups, LLC: Request for Two-Day Extension to Respond to Motions for Summary Judgment**

Mtatabikwa-Walker, Micah <Micah.Walker@lewisbrisbois.com>

Tue 7/9/2024 11:43 AM

To: Scott Rogers <scott@mriattorney.com>; Cribari, Sebastian <scribani@wwhgd.com>; Avakian, David <David.Avakian@lewisbrisbois.com>

Cc: Butler, Maceo <Maceo.Butler@lewisbrisbois.com>; Kurilla, Peggy <Peggy.Kurilla@lewisbrisbois.com>; Cabo, Ciarra Lei <CiarraLei.Cabo@lewisbrisbois.com>; Alberts, Jeremy R. <JAlberts@wwhgd.com>; Winde Goldstein <winde@mriattorney.com>; Bonney, Audra R. <ABonney@wwhgd.com>; Pastore, Sara B. <spastore@wwhgd.com>

You have permission to apply my e-signature. Thanks.



**Micah K. Mtatabikwa-Walker**  
**Partner**  
**Micah.Walker@lewisbrisbois.com**  
**T: 702.693.4308 F: 702.366.9563**

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**Mansfield Rule**  
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Sebastian,  
I agree, and I'll replace Jeremy's signature with yours.

David/Micah,  
Please advise if we can affix your e-signature to the updated SAO that is attached.

**SCOTT L. ROGERS, ESQ.**

Trial Attorney

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**E:** [scott@mriattorney.com](mailto:scott@mriattorney.com)